

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JOHN DOE,
Plaintiff,

v.

PRAIRIE VIEW A&M UNIVERSITY,
Defendant.

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CIVIL ACTION NO. 4:22-cv-01019

DEFENDANT’S OBJECTIONS TO PLAINTIFF’S EXHIBITS

No.	Description	Objection	Admitted?
1	Official transcript of academic record		
2	Final Investigative Report		
3	2-4-2021 Officer Davis police report		
4	Police supplemental case report		
5	Notices of allegation (May 4 and June 2, 2021)		
6	Jane Roe interview summaries from Final Investigative Report exhibits		
7	John Doe interview summaries from Final Investigative Report exhibits		
8	March 23, 2021 incident report closing Title IX case		
9	PVAMU Student Code of Conduct		
10	MD interview summaries from Final Investigative Report		
11	34 C.F.R. Part 106.45 (federal Title IX regulations)	FRE 402, 403 (not relevant, more prejudicial)	

No.	Description	Objection	Admitted?
		than probative); FRE 802 hearsay; FRE 901 unauthenticated	
12	Texas A&M and PVAMU Civil Rights Compliance Manual		
13	PVAMU Title IX Sanctioning Matrix		
14	February 4, 2021 Title IX outreach letter to Jane Roe		
15	February 22, 2021 Title IX outreach letter to Jane Roe		
16	March 1, 2021 Title IX outreach letter to Jane Roe		
17	Jane Roe/John Doe Procedural Chronology		
18	May 25, 2021 Letter from Patrick Sacoccio regarding specificity of charges	FRE 701 (improper lay opinion); FRE 702 (improper expert opinion); FRE 402 (relevance); FRE 403 (confusing the jury)	
19	Video of May 14, 2021 LaToya Douglas interview with MD	FRE 402, 403 (relevance, cumulative, confusing the jury); FRE 802 hearsay	
20	KH interview summary from Final Investigative Report		
21	SR interview summary from Final Investigative Report		

No.	Description	Objection	Admitted?
22	CD interview summary from Final Investigative Report		
23	Draft Investigative Report		
24	John Doe response to Draft Investigative Report		
25	Hearing Decision Letter		
26	March 15, 2022 Appeal Decision Letter		
27	Hearing Audio		
28	NH interview summaries from Final Investigative Report		
29	March 25 and 29, 2021, letters concerning student conduct charges		
30	March 23, 2021 student conduct letter – Denise Simmons to John Doe		
31	March 24, 2021 student conduct letter – Denise Simmons to John Doe		
32	March 24, 2021 Student Conduct Case Resolution Form		
33	March 29, 2021 student conduct appeal letter – Steven Ransom to John Doe		
34	April 9, 2021 notice of student conduct hearing – Donnie Howard to John Doe		
35	April 21, 2021 Student Conduct Case Resolution Form		
36	May 4, 2021, Letter from Alexis Boyd to Jane Roe		
37	LaToya Douglas notes on interview with KH		
38	Civil Rights Investigator Training		
39	June 17-24, 2021 emails between Alexis Boyd and LaToya Douglas		
40	May 20-26, 2021 emails between Alexis Boyd and LaToya Douglas		

No.	Description	Objection	Admitted?
41	May 20-24, 2021 emails between Alexis Boyd and LaToya Douglas		
42	Report closing John Doe conduct case		
43	August 25, 2021-September 2, 2021 emails between UPD and Title IX office		
44	Texas Southern University academic transcript – John Doe		
45	John Doe payments to Texas Southern University		
46	March 25-29, 2021 emails between Alan Doe and Steven Ransom re: conduct appeal		
47	University Trails lease 2021-22	FRE 402, 403 (relevance, confusing the jury); FRE 802 hearsay	
48	Coral Gables lease 2022-23	FRE 402, 403 (relevance, confusing the jury); FRE 802 hearsay	
49	John Doe appeal of Title IX decision		
50	John Doe damages worksheet	FRE 402, 403 (relevance, confusing the jury); FRE 802 hearsay; FRE 901 lack of authentication; speculation; <i>Cummings</i> objection	

No.	Description	Objection	Admitted?
51	Nathaniel Hall recorded statement		
52	Nathaniel Hall investigative interview		

Dated: January 29, 2024

Respectfully submitted,

/s/ Drew L. Harris

DREW L. HARRIS

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CERTIFICATE OF SERVICE

I certify that that on January 29, 2024, this document was filed electronically via the Court's CM/ECF system, causing electronic service upon all counsel of record.

/s/ Drew L. Harris

DREW L. HARRIS